

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

<i>IN RE:</i>	:	
	:	
A.G. DILLARD, INC.,	:	Case No.: 22-60115-RBC
	:	(Chapter 11)
Debtor	:	

CHANNEL PARTNERS CAPITAL, LLC d/b/a	:	
CHANNEL PARTNERS EQUIPMENT FINANCE:	:	
	:	
Movant	:	
	:	
v.	:	
	:	
A.G. DILLARD, INC., DEBTOR,	:	
	:	
Respondent	:	

**NOTICE OF MOTION FOR RELIEF
FROM AUTOMATIC STAY AND NOTICE OF HEARING**

PLEASE TAKE NOTICE that on March 31, 2022, Channel Partners Capital, LLC d/b/a Channel Partners Equipment Finance, a creditor in this case, filed a *Motion for Relief from Automatic Stay*, a copy of which is attached.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.)

PLEASE TAKE FURTHER NOTICE THAT if you object, you must:

1. File with the Court a written objection by mail or otherwise early enough so that the Court will receive it on or before April 21, 2022 at:

Clerk, United States Bankruptcy Court
1101 Court St., Room 166, Lynchburg, Virginia 24504 and

2. Send a copy to counsel for Channel Partners Capital, LLC d/b/a Channel Partners Equipment Finance:
Bradley T. Canter, Esquire
THE LAW OFFICES OF RONALD S. CANTER, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

PLEASE TAKE FURTHER NOTICE THAT the hearing on the Motion will be held **remotely via Zoom on April 26, 2022 at 11:00 AM**, and you may access such hearing via the following URL: <https://vawb-uscourts-gov.zoomgov.com/j/1603692643>. If you chose to login to the hearing using your own account, the Meeting ID is: 160 369 2643.

PLEASE TAKE FURTHER NOTICE THAT if you do not timely file and serve a written response to the relief requested in the Motion, the Court may deem any opposition waived, treat the motion as conceded and enter an order granting the relief requested in the Motion without further notice or a hearing. If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then you or your attorney must also attend the hearing on the Motion before the Honorable Rebecca B. Connelly, in the United States Bankruptcy Court for the Western District of Virginia, Lynchburg Division, via Zoom as set out above. If you fail to file a timely response or fail to attend the hearing even if a response is timely filed, the Court may consider any objection you may have waived and enter an order granting the relief requested.

Dated: March 31, 2022

Respectfully submitted,

THE LAW OFFICES OF RONALD S. CANTER, LLC

/s/ Bradley T. Canter

Bradley T. Canter, Esquire, #86766

200A Monroe Street, Suite 104

Rockville, Maryland 20850

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bcanter@roncanterllc.com

Counsel for Creditor,

Channel Partners Capital, LLC

d/b/a Channel Partners Equipment Finance

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing was served upon the individual(s) listed below by Electronic Notification pursuant to ECF procedures on this 31st day of March, 2022 to:

Brittany Berlaug Falabella, Esquire
Robert S. Westermann, Esquire
Hirschler Fleischer, A Professional Corp
2100 East Cary Street
Richmond, VA 23218-0500
bfalabella@hirschlerlaw.com
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Counsel for Debtor

Peter Barrett, Esquire
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Kutak Rock, LLP
901 E. Byrd St., Ste. 1000
Richmond, VA 23219
peter.barrett@kutakrock.com
jeremy.williams@kutakrock.com
Counsel for Official Committee of Unsecured Creditors

and mailed, first class, postage pre-paid this 31st day of March, 2022, to:

A.G. Dillard, Inc.
295 Memory Lane
Troy, Virginia 22974
Debtor

/s/ Bradley T. Canter

Bradley T. Canter